

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division

INMER E. CAMPOS-CARRANZA,)	
Plaintiff,)	
v.)	Civil Action No. 4:12-cv-94-MSD-TEM
)	
FEDERAL HOME LOAN MORTGAGE)	
CORPORATION, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**CONSENT MOTION TO EXTEND DEADLINE FOR PLAINTIFF'S
RESPONSE TO FREDDIE MAC'S MOTION TO DISMISS THE COMPLAINT**

Plaintiff INMER E. CAMPOS-CARRANZA, by counsel, pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7(F), hereby moves for an extension of time to respond to Defendant Federal Home Loan Mortgage Corporation ("Freddie Mac") Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6), and states as follows in support of this Motion:

1. Freddie Mac filed its Motion to Dismiss the Complaint on July 16, 2012, making Plaintiff's response due July 30, 2012. Plaintiff and Freddie Mac have agreed to a fourteen (14) day extension for Plaintiff to file its Opposition to the Motion to Dismiss, in order to allow Plaintiff additional time to brief the arguments raised in the Motion to Dismiss.

2. Additionally, Plaintiff and Freddie have agreed to an extension for Freddie Mac to file its Reply to the Opposition to the Motion to Dismiss.

3. The fourteen day extension would make Plaintiff's Opposition to the Motion to Dismiss due on or before August 13, 2012.

4. The extension would make Freddie Mac's Reply due on or before

August 22, 2012.

5. Upon the agreement of the parties and for the good cause shown, Plaintiff respectfully requests that this Court grant the Motion for Extension of Time and enter the Proposed Consent Order submitted to the Court.

Dated: July 24, 2012

Respectfully submitted,

INMER E. CAMPOS-CARRANZA

_____/s/_____

Kristi Cahoon Kelly, Esq. (VSB #72791)
Andrew J. Guzzo, Esq. (VSB #82170)
Surovell Isaacs Petersen & Levy PLC
4010 University Drive, Suite 200
Fairfax, VA 22030
703-277-9774
Fax: 703-591-9285
Email: kkelly@sipfirm.com
Email: aguzzo@sipfirm.com

Leonard Anthony Bennett, Esq. (VSB #37523)
Susan Mary Rotkis, Esq. (VSB #40693)
Consumer Litigation Associates
763 J Clyde Morris Boulevard, Suite 1A
Newport News, VA 23601
757-930-3660
Fax: 757-930-3662
Email: lenbennett@clalegal.com
Email: srotkis@clalegal.com

Matthew James Erausquin, Esq. (VSB #65434)
Consumer Litigation Associates PC
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
703-273-6080
Fax: 888-892-3512
Email: matt@clalegal.com

Dale Wood Pittman, Esq. (VSB #15673)
The Law Office of Dale W. Pittman, P.C.
112-A W Tabb St
Petersburg, VA 23803-3212

(804) 861-6000
Fax: (804) 861-3368
Email: dale@pittmanlawoffice.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of July 2012 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

Bizhan Beiramee, Esquire (VSB # 50918)
Beiramee & Cohen, P.C.
6663 B Old Dominion Drive, 3rd Floor
McLean, Virginia 22101
bbeiramee@beiramee.com
(703) 483-9600
(703) 483-9599 fax
*Counsel for Shapiro, Brown & Alt, LLP, and
Professional Foreclosure Corporation of Virginia*

William Woodul Tunner, Esq.
Thompson McMullan PC
100 Shockoe Slip, 3rd Floor
Richmond, VA 23219-4140
804-649-7545
Fax: 804-780-1813
Email: bmusick@t-mlaw.com
Counsel for GMAC Mortgage, LLC

Robert Ryland Musick, Esq.
Thompson McMullan PC
100 Shockoe Slip, 3rd Floor
Richmond, VA 23219-4140
804-649-7545
Fax: 804-780-1813
Email: bmusick@t-mlaw.com
*Counsel for Federal Home Loan Mortgage Corporation,
and GMAC Mortgage, LLC*

I further certify that a true and accurate copy of the foregoing was mailed, postage prepaid on this 27th day of July, 2012, to the following

Helmand Investment, LLC
c/o Registered Agent, Sharif Shafik
511 N. Lombardy Street
Arlington, Virginia 22203

/s/
Kristi Cahoon Kelly, Esq. (VSB #72791)
Surovell Isaacs Petersen & Levy PLC
4010 University Drive, Suite 200
Fairfax, VA 22030
703-277-9774
Fax: 703-591-9285
Email: kkelly@sipfirm.com
Counsel for Plaintiff